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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

Kai Zou and Brookelyn Thibodeaux,

Case No.: 3:15-cv-02587-JST

Plaintiff,

**STIPULATION TO VACATE ENTRY OF
DEFAULT AND [PROPOSED] ORDER**

vs.

Wyndham Vacation Ownership, Inc. and
DOES 1 to 20,

Defendant.

Plaintiffs Kai Zou and Brookelyn Thibodeaux (“Plaintiffs”) and Defendant Wyndham Vacation Ownership, Inc. (“Defendant”), by and through their attorneys of record, agree as follows:

WHEREAS Plaintiffs filed a Complaint in U.S. District Court Northern District of California against Defendant on June 10, 2015;

WHEREAS Plaintiffs served Defendant on June 12, 2015 at Defendant’s Napa, California site;

WHEREAS due to an administrative error, the served Complaint was not forwarded to Defendant’s corporate offices and Defendant’s in-house counsel did not receive the served documents;

WHEREAS Defendant did not respond to the Complaint and Default was entered by the Clerk on July 10, 2015;

IT IS THEREFORE STIPULATED that:

1. The Default entered against Defendant on July 10, 2015, be vacated, and
2. Defendant will file an Answer to the Complaint within three business days of vacating entry of default.

3. The date set by this Court for the Case Management Conference is not impacted by this Stipulation.

Dated: July 15, 2015

LAW OFFICES OF JOSEPH L. ALIOTO
AND ANGELA ALIOTO

By: /s/ Matthew J. Wayne

Angela Alioto
Matthew J. Wayne
Attorneys for Plaintiffs
Kai Zou and Brookelyn Thibodeaux

Dated: July 15, 2015

HIRSCHFELD KRAEMER LLP

By: /s/ John F. Baum

John F. Baum
Amy A. Durgan
Jacob R. Swiss
Attorneys for Defendant
Wyndham Vacation Ownership, Inc.

ORDER

Good cause appearing and pursuant to the parties' stipulation:

IT IS HEREBY ORDERED that the Clerk's entry of Default against Defendant Wyndham Vacation Ownership, Inc. on July 10, 2015 is hereby

Dated: July 16, 2015

IT IS SO ORDERED

Jon. S. Tigar

Judge Jon S. Tigar

HIRSCHFELD KRAEMER LLP
ATTORNEYS AT LAW
SAN FRANCISCO